

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

UNITED STATES OF AMERICA,	:	Case No.: 3:19CR-004
	:	
Plaintiff,	:	JUDGE JAMES G. CARR
	:	
v.	:	<b><u>MOTION FOR LEAVE TO FILE SENTENCING MEMORANDUM UNDER SEAL</u></b>
	:	
LECRON, ET AL.,	:	
	:	
Defendant.	:	

Now comes the Defendant, Elizabeth Lecron, by and through counsel, and respectfully requests that this Court grant her leave to file her Sentencing Memorandum under seal.

The Defendant is requesting that the Sentencing Memorandum be filed under seal because there is sensitive information contained in the Memorandum. Further, Defendant would like the opportunity to freely communicate to the Court the necessary sensitive information without concern that it may be read by other parties.

WHEREFORE, Defendant requests leave of this Court to file her Sentencing Memorandum under seal.

Respectfully submitted,

Stephen Newman  
Federal Public Defender  
Ohio Bar: 0051928

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